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/s/ Gordon R. Evans  
Vice President Federal Regulatory  
Bell Atlantic

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/s/ Heather B. Gold  
Vice President- Industry Policy  
Intermedia Communications


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/s/ Robert T. Blau  
Vice President Executive and Federal Regulatory  
Affairs  
BellSouth Corporation

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/s/ Priscilla Hill-Ardoin  
Senior Vice President – Federal  
Regulatory  
SBC Communications Inc.

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/s/ Richard Metzger  
Vice President Regulatory & Public Policy  
Focal Communications

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/s/ Don Shephard  
Vice President, Federal Regulatory  
Affairs  
Time Warner Telecom

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/s/ Alan F. Ciamporocero  
Vice President – Regulatory Affairs  
GTE Service Corporation

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/s/ Melissa Newman  
Vice President- Regulatory Affairs  
U.S. West, Inc.

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/s/ Russell C. Merbeth  
Vice President, Legal and Regulatory  
Affairs  
WinStar Communications, Inc.

cc: K. Brown  
D. Attwood  
R. Beynon  
J. Goldstein  
S. Whitesell  
K. Dixon  
C. Wright  
L. Strickling  
R. Atkinson  
M. Carey  
J. Jackson  
J. Jennings

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/s/ Robert T. Blau  
Vice President Executive and Federal Regulatory  
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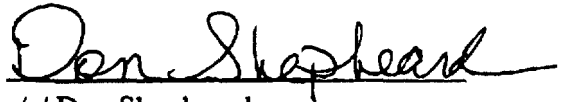
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/s/ Priscilla Hill-Ardoin  
Senior Vice President – Federal  
Regulatory  
SBC Communications Inc.

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/s/ Richard Metzger  
Vice President Regulatory & Public Policy  
Focal Communications

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/s/ Don Shepherd (AT)  
Vice President, Federal Regulatory  
Affairs  
Time Warner Telecom

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/s/ Alan F. Ciamporcero  
Vice President – Regulatory Affairs  
GTE Service Corporation

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/s/ Melissa Newman  
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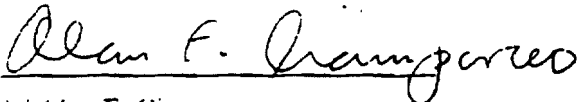
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**EXHIBIT C**

## **Reconfiguring Special Access Arrangements to Unbundled Network Elements (UNEs)**

This document is intended to describe the self-certification criteria required in order for Telecommunication Carriers to reconfigure special access arrangements to Unbundled Network Elements (UNE).

### **I. Background**

The FCC's UNE Remand Order, published in the Federal Register on January 18, 2000 as modified by its November 24, 1999 Supplemental Order, in CC Docket No. 96-98 concluded that ILECs could constrain the ability of telecommunications carriers to reconfigure Special Access arrangements to combinations of loop and transport unbundled network elements (UNEs), except under certain circumstances. Specifically, the FCC concluded that telecommunications carriers who are using special access arrangements to provide a significant amount of local exchange, in addition to exchange access service, to a particular customer could be permitted to reconfigure those special access arrangements to a combination of unbundled loop and transport network elements. In elaborating on what constitutes "significant" local exchange service, the FCC cited with approval a September 2, 1999, joint ex parte filing by Bell Atlantic, Intermedia Communications, Allegiance Telecom, and Time Warner Telecom. The FCC also stated that a telecommunications carrier is providing significant local exchange service if the requesting carrier is providing all of an end user's local exchange service.

In addition to authorizing the reconfiguration of special access circuits under the circumstances specified above, the FCC stated that "in situations where the requesting carrier is collocated and has self-provided transport or obtained transport from an alternative provider, but is purchasing unbundled loops, that carrier may provide only exchange access over those facilities."

Finally, the FCC concluded that requesting carriers must self-certify that they are providing a significant amount of local exchange service over special access arrangements in order for those special access arrangements to qualify for reconfiguration to a combination of unbundled loop and transport. For purposes of certification, internet traffic is interstate and not local in nature. A blank copy of the Certification and Options form can be found in the Forms section.

### **II. Qualification Criteria**

#### **A. Loop and Transport Combinations**

Carriers may reconfigure a special access arrangement to a combination of unbundled loop and transport network elements when the special access arrangement

- originates at a customer's premise and terminates at the telecommunications carrier's collocation arrangement, and

- has an equivalent UNE NC/NCI code, and
- one of the following options is met at the time of certification:



#### Option I

- the telecommunications carrier is the exclusive provider of an end user's local exchange service

#### Option II

- the telecommunications carrier provides local exchange and exchange access service to the end user customer and handles at least one third of the end user customer's local traffic measured as a percent of total end user customer lines and
- at least 50% of the activated channels on the loop portion of the loop and transport combination have at least 5% local voice traffic individually and
- the entire special access arrangement has at least 10% local voice traffic and
- if a loop/transport combination includes multiplexing (e.g., DS1 multiplexed to DS3 level), each of the individual DS1 circuits meets the above criteria for this option.

#### Option III

- at least 50% of the traffic on at least 50% of the channels on the loop portion of the special access arrangement is local voice traffic and
- the entire special access arrangement has at least 33% local voice traffic and
- if a loop/transport combination includes multiplexing (e.g., DS1 multiplexed to DS3 level), each of the individual DS1 circuits meets the above criteria for this option.

### **Switched Access and Local Interconnection Trunking**

Where special access arrangements are comprised of a combination of special access circuits, switched access direct trunked transport (DDT) or local interconnection trunks, the switched access direct trunk transport (DDT) and local interconnection trunks must be groomed from special access arrangements prior to initiating the reconfiguration process.

#### **B. Loops Terminating in Collocation Space**

Loops that are terminate in a collocation space may be purchased as UNEs.

#### **C. Ongoing Qualification**

- A telecommunications carrier that has reconfigured a special access circuit to UNEs will take reasonable measures on an ongoing basis to ensure that all certifications remain valid.
- A telecommunications carrier that has certified in accordance with the above criteria will re-certify its continuing compliance with such criteria every six months. The telecommunications carrier will have met this obligation by sending a letter to its account manager indicating that, based on information provided by the customer, it has re-confirmed that all circuits continue to meet the criteria for reconfiguration to unbundled loop and transport. Carriers may not re-certify compliance without

obtaining information from their customers that will permit them to conclude that those customers' circuits continue to meet the certification criteria.

### III. Ordering Requirements

SBC will accept requests to reconfigure Special Access arrangements to Unbundled Network Elements (UNEs) using the existing ordering processes for Unbundled Loops and Unbundled Local Transport with the following modifications:

- Telecommunications Carrier (TC)/Competitive Local Exchange Carrier (CLEC) sends to Account Manager a correctly completed Certification Letter and Certification Spreadsheet. See Certification Letter and Certification Spreadsheet in the Forms section.
- All reconfiguration of Special Access arrangements to UNEs will be handled as projects. Due dates for all projects are to be negotiated. TC/CLEC must send a Reconfiguration Project Spreadsheet to the Account Manager. This spreadsheet is IN ADDITION not in lieu of the issuance of the following ASR/LSR/EDI orders. See Reconfiguration Project Spreadsheet. A spreadsheet is to contain information limited to one end user location and collocation cage. For reconfigurations including multiplexing, a spreadsheet is to contain all circuit IDs in the Special Access arrangement (higher speed and all riding circuits).
- TC/CLEC issues ASR to ICSC to disconnect access circuit

### IV Billing

- Termination liability, if applicable, will be billed at the time of disconnect on the Special Access circuit. *→ from access tax*
- All UNE NRCs in the configuration will apply unless a state commission has ruled otherwise.

[illegible]

**CERTIFICATION PURSUANT TO FEDERAL COMMUNICATIONS  
COMMISSION'S *SUPPLEMENTAL ORDER*  
DATED NOVEMBER 24, 1999 IN CC DOCKET NO. 96-98**

\_\_\_\_\_ (“Carrier”) hereby certifies that it is requesting that the following special access circuits be reconfigured as a combination of unbundled loop and transport network elements. Pursuant to the FCC’s *Supplemental Order*, in support of its request, Carrier also hereby certifies that the specifically identified circuits provide a significant amount of local exchange service, in addition to exchange access service, to [insert end user customer(s) name and address] via those circuits. By “a significant amount of local exchange service,” Carrier certifies that each of the identified circuits meet one of the following certification options:

**Option 1**

1. The carrier is the exclusive provider of the end user’s local exchange service

**Option 2**

1. Carrier handles at least one third of the identified customer’s local traffic; and
2. On the loop portion of the UNE loop-transport service, at least 50 percent of the activated channels have at least 5 percent local voice traffic individually and,
3. For the entire facility, at least 10 percent of the traffic is local voice traffic.
4. If the unbundled loop/transport combination includes multiplexing (e.g. DS1 multiplexed to DS3 level), each of the individual DS1 circuits meets the above criteria for this option.

**Option 3**

1. At least 50% of the channels are used to provide local dial tone service and at least 50% of the traffic on each of those local dial tone channels is local voice traffic
2. The entire loop facility has at least 33% local voice traffic and
3. If a loop/transport combination includes multiplexing (e.g. DS1 multiplexed to DS3 level), each of the individual DS1 circuits meets the above criteria for this option.

Carrier must certify that the requisite information is true for each circuit, and must indicate which Option applies to which circuit. In order to rely on one of the foregoing Options, Carrier must provide the following information for that Option. Carrier may submit the information in the format provided with this Certification, or may submit the information in a different format, as long as it is acceptable to SBC. Carrier's Certification is applicable to all information submitted in support of the Certification. Certifications and/or certification information submitted incorrectly, incompletely or in a form not acceptable to SBC will cause the Certification to be rejected.

**For Option 1:**

1. Facility Identification Number of each circuit
2. Customer Name and Address for each circuit

**For Option 2:**

1. Facility Identification Number for each circuit
2. Customer Name and Address for each circuit
  - Total customer lines at the address
  - Total lines provided by Carrier at the address
3. Number of active channels on the loop portion of each circuit
  - State the number of channels carrying at least 5% local voice traffic
4. Certify that at least 10% of each facility carries local voice traffic

**For Option 3:**

1. Facility Identification Number for each circuit
2. Customer Name and Address for each circuit
3. Number of active channels on the loop portion of each circuit
4. Number of channels providing local dial tone service on the loop portion of each circuit
5. Percentage of traffic on each local dial tone channel that is local voice traffic
6. Certify that at least 33% of the loop facility carries local voice traffic

This certification is made by Carrier through its authorized representative \_\_\_\_\_, whose title is \_\_\_\_\_, and who is fully competent to make this Certification, and who has personal knowledge of the facts stated in the Certification and attachments, and attests that they are true and correct.

EXECUTED THIS \_\_\_\_ DAY OF \_\_\_\_, 2000 BY:

\_\_\_\_\_  
[FULL LEGAL NAME OF CARRIER]

\_\_\_\_\_  
Authorized Representative of [Full Legal Name of Carrier]

Certification Accepted/Rejected by [SBC Entity]

Reasons for Rejection: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_


	Option 1		Option 2									
For each circuit ID in Special Access configuration	Is the carrier the exclusive provider of end user's local exchange service?		Does the carrier handle at least 1/3 of the identified customer's local traffic?				On the loop portion of the circuit, state the number of activated channels have at least 5% local voice traffic individually?	For the entire facility, is at least 10% of traffic local voice traffic?	If facility includes multiplexing, do each of the DSL circuits meet the conditions?	Is at least 50% of portion of		
Customer Name Facility ID and Address	Yes	No	Yes	No	Total customer lines at address	Total lines provided by Carrier at address	Number of Active channels carrying 5% local voice traffic	Yes	No	Yes	No	Yes

Option 3				
At least 50% of traffic on channels on loop If facility local voice traffic?	Does the entire special access arrangement have at least 33% local voice traffic?		If facility includes multiplexing, do each of the DS1 circuits meet the conditions?	
	Yes	No	Yes	No
Number of Active channels carrying 5% local voice traffic No				



### CERTIFICATE OF SERVICE

I, Edward W. Kirsch, hereby certify that on April 26, 2000, I caused to be served upon the following individuals the Comments of Level 3 Communications, LLC in CC Docket 00-65:



Edward W. Kirsch

***Via Electronic filing:***

Magalie Roman Salas, Secretary  
Office of the Secretary  
Federal Communications Commission  
Room TW-B-204  
445 Twelfth Street, S.W.  
Washington, DC 20554

Michael K. Kellogg  
Auston C. Schlick  
Kellogg, Huber, Hansen, Todd &  
Evans, P.L.L.C.  
1301 K. Street, N.W., Suite 1000 West  
Washington, DC 20005

***Via Overnight Delivery:***

Janice Myles  
Policy and Program Planning Division  
Common Carrier Bureau  
Federal Communications Commission  
Room 5-C-327  
445 Twelfth Street, S.W.  
Washington, DC 20554

Katherine Farroba  
Public Utility Commission of Texas  
1701 N. Congress Ave., P.O. Box 13326  
Austin, TX 78711-3326

Jamie Heisler  
U.S. Department of Justice  
Antitrust Division  
Telecommunications Task Force  
1401 H Street, NW, Suite 8000  
Washington, DC 20005

James D. Ellis  
Paul M. Mancini  
Martin E. Grambow  
Kelly M. Murray  
175 E. Houston  
San Antonio, TX 78205

Alfred G. Richter, Jr.  
175 E. Houston  
Room #1275  
San Antonio, TX 78205

ITS, Inc.  
1231 - 20<sup>th</sup> Street, NW  
Washington, DC 20036

Ann E. Meuleman  
1616 Guadalupe Street, Room 600  
Austin, TX 78701-1298

**EXHIBIT B**

RECEIVED  
APR 27 2000  
FEDERAL BUREAU OF INVESTIGATION  
U.S. DEPARTMENT OF JUSTICE

ORIGINAL

Bell Atlantic  
1300 I Street, Suite 400A  
Washington, DC 20005  
202 336-7888 Fax 202 336-7922  
E-Mail: susanne.a.guyer@BellAtlantic.com

Susanne Guyer  
Assistant Vice President  
Federal Regulatory

EX PARTE OR LATE FILED



February 29, 2000

RECEIVED

FEB 29 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**Ex Parte**

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: **CC Docket No. 96-98: Implementation of the Local Competition Provisions  
of the Telecommunications Act of 1996**

Dear Ms. Salas:

On behalf of Bell Atlantic, Intermedia Communications, BellSouth Corporation, SBC Telecommunications, Inc., Focal Communications, Time Warner Telecom, GTE Service Corporation, U.S. West, Inc., and WinStar Communications, Inc., I submit the attached letter for inclusion in the above-referenced docket.

Pursuant to section 1.1206 of the Commission's rules, an original and one copy of this notice are being submitted.

Sincerely,

A handwritten signature in cursive script, appearing to read "Susanne Guyer".

Attachment

No. of Copies rec'd 041  
List A B C D E

February 28, 2000

The Honorable William E. Kennard, Chairman  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W. Room 8-B-201  
Washington, DC 20554

The Honorable Susan Ness, Commissioner  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Room 8-B-115  
Washington, DC 20554

The Honorable Harold W. Furchtgott-Roth, Commissioner  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W. Room 8-A-302  
Washington, DC 20554

The Honorable Michael K. Powell, Commissioner  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Room 8-A-204  
Washington, DC 20554

The Honorable Gloria Tristani, Commissioner  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W., Room 8-C-302  
Washington, DC 20554

Re: Implementation of the Local Competition Provisions of the Telecommunications Act of  
1996, CC Dkt. No. 96-98

Dear Chairman Kennard and Commissioners:

The Third Report and Order, as modified by the Supplemental Order, addressed the circumstances under which carriers may purchase loop/transport combinations as unbundled network elements (UNEs). The undersigned believe that the industry could benefit from a further clarification of that Order. Based on the text and the intent of the Third Report and Order and the Supplemental Order, as well as the ex parte referenced in footnote nine of the Supplemental Order, the undersigned believe that, under existing rules and policies reflected in those Orders, a requesting carrier may purchase loop/transport combinations only if one of the three options described below is met.

Option 1

- The telecommunications carrier is the exclusive provider of an end user's local exchange service and the loop transport combination originates at a customer's premises and terminates at the telecommunications carrier's collocation arrangement; and
- this option does not allow loop/transport combinations to be connected to ILEC services.

- or -

Option 2

- The telecommunications carrier provides local exchange and exchange access service to the end user customer and handles at least one third of the end user customer's local traffic measured as a percent of total end user customer lines; and
- for DS1 level and above, at least 50% of the activated channels on the loop portion of the loop and transport combination have at least 5% local voice traffic individually; and
- the entire loop facility has at least 10% local voice traffic; and
- the loop/transport combination originates at a customer's premises and terminates at the telecommunications carrier's collocation arrangement, and
- if a loop/transport combination includes multiplexing, each of the multiplexed facilities must meet the above criteria for this option. For example, if DS1 loops are multiplexed onto DS3 transport, each of the individual DS1 facilities must meet the criteria for this option in order for the DS1/DS3 loop/transport combination to qualify for UNE treatment; and
- this option does not allow loop/transport combinations to be connected to ILEC services.

- or -

Option 3

- For the conversion of services to combinations of unbundled network elements, at least 50% of the activated channels are used to provide originating and terminating local dial tone service and at least 50% of the traffic on each of these local dial tone channels is local voice traffic (measured based on the incumbents local exchange area);<sup>1</sup> and
- the entire loop facility has at least 33% local voice traffic; and
- if a loop/transport combination includes multiplexing, each of the multiplexed facilities must meet the above criteria for this option. For example, if DS1 loops are multiplexed onto DS3 transport, each of the individual DS1 facilities must meet the criteria for this option in order for the DS1/DS3 loop/transport combination to qualify for UNE treatment; and
- this option does not allow loop/transport combinations to be connected to ILEC services.

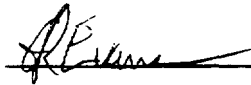
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<sup>1</sup> The signatory ILECs interpret the existing orders as requiring combinations to terminate in a collocation facility, however, they agree to waive that requirement only with respect to option three, subject to the other limitations of this letter. All of the signatories agree that the absence of a collocation requirement for Option 3 cannot be read to suggest that UNE loops or loop/transport combinations can be connected to ILEC services.

In order to confirm reasonable compliance with these requirements, the undersigned agree that certain auditing rights are appropriate. It is not the parties' intention that such audits be routine practice, but rather would be invoked when the ILEC has concern that a UNE purchaser has not met the criteria for significant local service. In particular, the parties agree that auditing consistent with the following general guidelines would be reasonable and appropriate.

- 1) The ILEC may, upon 30 days written notice to a carrier that has purchased loop/transport combinations as UNEs, conduct an audit to ascertain whether those loop/transport combinations were eligible for UNE treatment at the time of certification and on an ongoing basis thereafter.
- 2) The CLEC shall make reasonable efforts to cooperate with any audit by the ILEC and shall collect, compile, maintain and, in connection with an audit, provide the ILEC with relevant records (for example call detail records) for all traffic that has been transmitted over all loop/transport combinations subject to the audit. CLECs must maintain auditable records for at least 12 months, or, in the event of an audit or dispute, until such audit or dispute is resolved, whichever is longer.
- 3) An independent auditor hired and paid for by the ILEC shall perform any audits, *provided, however*, that if an audit reveals that a certification by the CLEC does not meet or has not met the certification requirements, the CLEC shall reimburse the ILEC for the cost of the audit.
- 4) An audit shall be performed using industry audit standards during normal business hours, unless there is mutual agreement otherwise.
- 5) The ILEC may not exercise its audit rights with respect to a particular CLEC (excluding affiliates) more than twice in any calendar year, unless an audit finds noncompliance.
- 6) Audits conducted by the ILEC for the purpose of determining compliance with certification criteria are "over and above" any audit rights that the ILEC may have pursuant to an interconnection agreement between the CLEC and the ILEC.

We would be happy to address any questions you might have regarding our proposal.



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Vice President Federal Regulatory  
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Vice President- Industry Policy  
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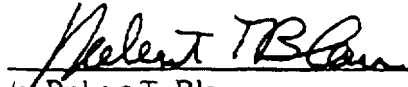
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SBC Communications Inc.

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/s/ Don Shephard  
Vice President, Federal Regulatory  
Affairs  
Time Warner Telecom

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/s/ Melissa Newman  
Vice President- Regulatory Affairs  
U.S. West, Inc.

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/s/ Russell C. Merberh  
Vice President, Legal and Regulatory  
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WinStar Communications, Inc.

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